

Preliminary EA

Submission Successful
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Names & Addresses

Mr. Herm Hoops
 POB 163
 Jensen, Utah 84035, United States
 Email Address: hoops@ubtanet.com
 Day Phone: 1
 Evening Phone:
 Fax Number:
 Other Phone:
 Agency: Public Web Page

Comments

Comment 1
 ID:

Comment Title: BLK Oil & Gas leases adjacent to Dinosaur National Monument

Comment: Primarily regarding proposed BLM leases #8510, #8501, #8512 & #8502 adjacent to the west boundary of Dinosaur National Monument.

I own a company that receives its gross sales from the Utah (Uintah County) river running business. I am not against mining or oil and gas extraction per se. We are opposed to those activities when they have a negative effect upon our industry and the environment and thus we oppose leasing the parcels in question.

The massive of Split Mountain is the major icon of the Uinta Basin, it can be seen from far and wide. The area in question will be a major day and night intrusion on that scene and will have a profound effect on our customers coming to and going from the river on US40 and the access road to the Quarry and Split Mountain

ECONOMY

RIVER RUNNING AT DINOSAUR NM IS A MAJOR CONTRIBUTOR TO A STABLE LOCAL ECONOMY

As recreation business owners and outfitters, protecting outdoor space is not just important to us personally, but a matter of economic security. Leases like those proposed by BLM have the effect of seriously damaging outfitters ability to attract customers, and it is likely the proposed action may put some outfitters out of business

The strong local economy that stems from visitation, outdoor recreation and river running at Dinosaur National Monument deserves protection. The customers who come here to run rivers come to escape the cluttered, industrial and overcrowded areas they are from. Park visitors will not return if they do not have a positive experience, and that experience is often closely related to the environmental quality of the park. Because they do not exist as islands, cut off from their surrounding landscapes, national parks and their air, waters, wildlife, and cultural resources can be degraded by incompatible activities on adjacent lands. Oil and gas production and its associated infrastructure and industrial traffic can be incompatible activities when occurring on park-adjacent lands.

A recent National Park Service (NPS) report shows that 304,312 visitors to Dinosaur National Monument in 2016 spent \$ 18,084,200 in communities near the park. That spending supported 244 jobs in the local area and had a cumulative benefit to the local economy of \$20,457,600.

VIEWSHED

The dramatic sweeping view of Split Mountain from the nearby area, as well as from the entire Uintah Basin is an icon of this land. The parcels in question affect the scenic viewshed of visitors to Dinosaur National Monument, including our customers. Most of our customers come here from far away. The river running and tourism industry relies on a natural landscape. If our customers are negatively affected by their experience they will not go on future river trips, and their word-of-mouth will affect other potential clients.

The proposed leases will have a profoundly negative effect upon:

- Dinosaur is considered to be one of the few areas of the lower 48 states to have a night sky that retains its natural characteristics, ambient light from the drilling rigs would have a negative local impact for months.

- Silence is another unquantified benefit of both Wilderness and a visit to Dinosaur National Monument. In the 1980's Dinosaur National Monument conducted an ambient sound study. The stations provided data that was so low it was thought they were defective and they were replaced with more sophisticated monitors. The sound levels were less than 8 decibels on a sustained level.

All sound produced or caused by the project MUST be mitigated. The BLM will have to gather and propose data to determine the effect of wind, geology, aspect and other factors on the sound generated from the proposed leases and

how those sounds travel from each of the drill site, access roads or other infrastructure to mitigate the effect of ambient sound. There are no controls on the sound generated by motors of rigs, pipeline construction, vehicles and other sources the proposed action will bring.

Overall the intrusion of non-natural sounds are almost undetectable at Dinosaur N.M. Low frequency sounds, like those from trucks, equipment and drilling will have a negative effect for miles. It disrupts wildlife mating, birthing and migration. At the well site, especially during drilling, it is not uncommon for a half-dozen semi trucks to sit idling for hours - in some cases over 20 hours.

WILDLIFE & PLANTS

These leases, on a ridgeline, will have a negative effect upon wildlife. It will certainly disrupt their migration and movement routes, as well as cover for birthing. This is important, especially for the sage grouse who is in a steep population decline directly related to oil and gas exploration.

Horse packing outfitters have to assure their use of noxious weed free forage brought into Federally managed areas. In some cases they are required to remove manure to prevent the spread of noxious weeds. How will the individual vehicles entering the area be checked to see they are not introducing or spreading noxious or exotic species? The BLM has already spent hundreds of thousands of dollars on noxious weed and exotic plant management. Dinosaur has expanded an even greater, Nationally recognized weed and exotic species management plan. The proposal for the leases will expand the problem related to those plants.

AIR QUALITY & HEALTH

Dinosaur National Monument goes through days when the air quality is almost as bad as you'd find in major metropolitan areas. The problem is tied, in part, to the oil and gas development in the surrounding Uinta Basin of Utah. There, thousands of wells are generating air pollution levels that, in some parts of the basin, are on par with air quality in downtown Los Angeles. Some of that pollution drifts over to Dinosaur N.M., where air sampling results show the national monument exceeded U.S. Environmental Protection Agency's eight-hour National Ambient Air Quality Standards level for ozone pollutants some 26 days during the winter of 2012-13. American lung Association gave 9 Utah counties (including Uinta and Duchesne) poor grades.

Thousands of people swim, bath and use the river as a source of culinary water on river trips. While water filters remove giardia bacteria, they do not remove petroleum related products or other harmful chemicals. There is no adequate warning system in place to advise people on the river that an "incident" has occurred.

ARCHEOLOGICAL RESOURCES

The area adjacent to the leases within monument boundary is loaded with archeological sites and petroglyphs. The drilling vibrations and heavy traffic is sure to damage or destroy some of these sites. In addition more access and people, without agency oversight will lead to vandalism and looting of archeological resources.

INCONSISTENCIES

A new Interior Department report says more than half the public lands leased to oil and gas companies are sitting idle while the industry and congressional critics are clamoring to open more federal swaths for exploration. Rent on federal oil and gas leases is \$2.50/acre per year. At current low oil prices the American taxpayer will be a loser from these leases. A recent federal oil and gas lease auction was a bit of a bust with only two parcels fetching the \$2-an-acre minimum. LT Land Group LLC of Salt Lake City bid \$25 an acre for one. International Petroleum bid \$9 per acre for the other.

BLM and the State of Utah lack the personnel to adequately monitor the increased use of the area by drill crews that do not fully understand the implications of their actions. What mitigation is proposed to limit the effect of litter, industrial debris and jetsam or unauthorized looting of archeological sites?

In the past the BLM has been sensitive permitting drilling activities so close to National Parks and Monuments. Given the fact that Dinosaur National Monument is the scene of the most significant conservation battle of the past Century (Echo Park Dam) it is ironic these leases are being approved for a location in a Wilderness Study Area and within the VERY apparent viewshed of the most heavily visited section of the Monument? Yet at the same time the Colorado BLM has instituted a protected viewshed on the Colorado side of Dinosaur National Monument.

The Green River through this area has been found eligible to be a Wild and Scenic River. This means, like a Wilderness Study Area, it must be managed in the interim in order to protect its values, as if it is a Wild and Scenic River, until a decision has been made on the suitability of the river. The proposed developments will affect the nature of the river visually, in sound and in the nature of the experience, and is inconsistent with Wild & Scenic River legislation.

Submission Classification

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